



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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August 18, 2014

Ms. Larissa Read
Gulf Islands National Seashore - GMP
National Park Service
Denver Service Center - Read
P.O. Box 25287
Denver, CO 80255

**SUBJECT: Gulf Islands National Seashore General Management Plan Final
Environmental Impact Statement;
CEQ# 20140191**

Dear Ms. Read,

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the referenced National Park Service (NPS) Final Environmental Impact Statement (FEIS) for the proposed update to the general management plan (GMP) for the Gulf Islands National Seashore (national seashore). The national seashore was established by Congress in 1971, and encompasses barrier islands and mainland areas in Florida and Mississippi. The last national seashore GMP was developed in 1978 and doesn't include boundary expansions such as areas of Cat Island and portions of Marsh Point near Davis Bayou and designated wilderness areas, Horn and Petit Bois Islands. In addition, environmental pressures such as increased development in the area and climate change have facilitated the need for an update to the GMP. The purpose of this NEPA action is to evaluate different management strategies being considered by the NPS for the new GMP for the national seashore.

The NPS evaluates four alternative management strategies under this FEIS. These management strategies include:

- **Alternative 1 (the no-action alternative)** - would continue the existing management and trends, including recovery efforts to reestablish the national seashore's programs and facilities that existed in 2004 before Hurricane Ivan. This alternative serves as a basis for comparison in evaluating the other alternatives.
- **Alternative 2** - would reduce the level of infrastructure rebuilt on the barrier islands and allow natural processes to predominate. The visitor experience would transition into a

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more primitive island experience, while mainland programs and services would be enhanced.

- **Alternative 3 (NPS preferred Alternative)** - would enhance visitor education, research, and resource protection opportunities throughout the national seashore.
- **Alternative 4** - would expand and diversify visitor opportunities throughout the national seashore by leveraging additional partnerships.

EPA has the following comments based on our review of the FEIS:

Alternatives:

In general, EPA is pleased with the detailed analysis of alternatives provided in the FEIS. The NPS identification of an environmentally preferred alternative and the overall preferred alternative allows EPA and other reviewers to better understand the direction the NPS is leaning for selection of an alternative. The NPS has identified Alternative 3 as both the environmentally preferred and the overall preferred alternative for this proposed action.

Under the section titled "Identification of the NPS Preferred Alternative" a process for selection of the preferred alternative was described. Five criteria were used to select the preferred alternative: 1) Provide Quality Visitor Opportunities; 2) Protect Wilderness Values; 3) Protect, Enhance, and Restore Gulf Coastal Ecosystems; 4) Provide Socioeconomic Benefits to Nearby Communities; and 5) Improve Efficiency of the NPS Operations. EPA recommends that the NPS provide additional clarification on how the five selecting criteria were chosen and details of how each alternative was scored. Providing the scoring for each criteria for each alternative would enhance this section.

The selection of the environmentally preferred alternative used a more subjective approach than the approach used to select the NPS preferred alternative. Specifically, a scoring system was used to select the NPS preferred alternative, but not the environmentally preferred alternative. EPA recommends additional discussion with respect the methodology used by the NPS for selection of the environmentally preferred alternative.

Priority Indicators and Standards:

Several standards or "thresholds" were selected to provide the NPS with feedback on effectiveness of management strategies for priority indicators (or user capacity indicators). For example the NPS states "Park staff are already monitoring the number of shorebird mortalities along the Fort Pickens and Santa Rosa roadways and thus the standard of no more than 10 shorebird mortalities on these roadways every two weeks during nesting season (March through August) can be reliably tracked. This standard was chosen to reduce the impacts that speeding vehicles, pedestrians, and bicyclist have on shorebird mortalities. If the standard for this indicator is trending upward, seashore management can develop an educational program addressing the impacts of speeding on the roadway." We applaud the NPS's efforts to develop standards or thresholds that help evaluate the effectiveness of the management strategies, but we are somewhat unclear on how these standards or "thresholds" were developed. EPA recommends additional consideration regarding the development of these standards.

Emergency Response Activities – Deepwater Horizon Spill:

The NPS references deep cleaning of sand and beaches as part of oil spill response activities throughout the FEIS. EPA is comfortable with the NPS using this technique as a short-term activity to fully remove oil spill related materials, but sifting of beach material as a regular maintenance activity should be avoided. EPA is concerned that this type activity could break up microbial elements that help hold sand together, leading to greater erosion.

Environmental Justice and Public Outreach:

Under the Environmental Justice (EJ) section a public outreach effort is described. The NPS states that “The Park staff and planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.” Given that areas close to the national seashore have Hispanic, Asian, and other diverse populations, the NPS should include discussion regarding strategies used to meaningfully engage or outreach to these communities in the decision-making and assessment process (i.e., Spanish materials/translators provided during the public involvement process, etc).

Cumulative Impacts:

EPA is pleased that the NPS provided cumulative impact discussions in the context of each environmental impact area and each alternative. A common theme throughout the cumulative impact discussion was the Deepwater Horizon oil spill response activities. EPA recommends that the NPS provide additional detail with regards to how the Deepwater Horizon oil spill and response activities will impact future environmental conditions of the national seashore and how these changes will impact the proposed general management strategies proposed by the NPS.

Although comments were offered for this FEIS, EPA supports the NPS selection of Alternative 3 as the preferred alternative, especially since it was also identified as the environmentally preferred alternative. EPA suggest additional clarification be provided in the ROD and revisited throughout the implementation of the GMP.

Please contact Ken Clark of my staff at (404) 562- 8282 if you have any questions or want to discuss our comments further.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
EPA Region 4